## REMARKS

Claims 1-18 are pending in the application and are thought to be allowable. The Applicants respectfully request reconsideration and allowance of all pending claims.

The Office Action Summary indicates that the drawings are both accepted and objected to by the Examiner. The originally filed drawings appear to satisfy the PTO drawing requirements. Thus, unless a specific objection is made and specific issues with the drawings identified, the drawings are presumed to be acceptable.

The Office Action fails to establish that claims 1-3, 6-9 and 12-18 are anticipated under 35 U.S.C. 102(e) by "Thomas" (US patent no. 6,671,756 to Thomas et al.). The rejection is respectfully traversed because the Office Action does not show that all the limitations are taught by Thomas.

Claim 1 sets for a method for operating a data processing system via a plurality of computer systems coupled to a network. A management interface process is also coupled to the network. Claim 1 includes various limitations that are not shown to be taught or suggested by Thomas. For example, one set of limitations includes initiating on one or more selected ones of the computer systems one or more instances of an independently operable console view, and the Office Action cites Thomas' Abstract, col. 3, l. 37-56 and col. 24, l. 1-19. However, none of these teachings have elements that bear any apparent resemblance to the claimed "instances of an independently operable console view." Furthermore, the Office Action fails to cite any specific elements as corresponding to the instances of the independently operable console view.

Another set of limitations of claim 1 includes instantiating on the management interface processor one or more logical console objects. The cited teachings of Thomas at col. 5, l. 36-67 and col. 25, l. 63-67 do not contain any apparent suggestion of the claim limitations. For example, the text at col. 5, l. 36-67 describes FIGs. 2 and 5, which show cable connections. The text at col. 25 identifies a sync generator within a switch. Thus, there is no apparent correspondence between the claim limitations and the cited teachings of Thomas.

Yet another set of limitations of claim 1 includes initiating on one or more selected ones of the computer systems one or more instances of a system operations program, and coupling the

one or more instances of the system operations program to respective logical console objects. None of the Thomas' teachings at FIGs. 9 and 11 and col. 8, l. 34-46, as cited by the Office Action, bear any apparent resemblance to these claim limitations. For example, Thomas' FIG. 9 shows a prior art processor architecture, and FIG. 11 illustrates a single computer interface module with an API that interfaces with two user paths (col. 14, l. 67 – col. 5, l. 5). There are no apparent elements of Thomas that correspond to the claimed systems operations program, nor is there any apparent teaching of the claimed coupling of an instance of system operations program to a respective logical console object.

Further limitations of claim 1 include, in response to user-initiated connection requests, coupling each instance of the console view to a selected instance of the system operations program. These limitations are not shown to be taught by Thomas because there is no apparent correspondence between the limitations and Thomas' teachings. Furthermore, the Office Action does not cite any teachings of Thomas as corresponding to these claim limitations.

The further limitations of transmitting data received from a console view from instances of the system operations program to respectively coupled logical console objects and transmitting data received from the logical console objects to one or more instances of a console view are not shown to be taught by Thomas for at least the reasons set forth above. Having failed to show complete correspondence between all the claim limitations and the teachings of Thomas, the Office Action does not show that claim 1 is anticipated by Thomas. However, if the rejection is maintained, Applicants respectfully request that the Examiner provide citations to specific elements of Thomas that are thought to correspond to the claim limitations.

Claim 7 includes limitations similar to those of claim 1 and is not shown to be anticipated for at least the reasons set forth above.

Claim 2 depends from claim 1 and includes further limitations of displaying data received at an instance of a console view in a manner consistent with a first set of configuration parameters associated with the instance of the console view. Not only does the Office Action fail to show any teaching of the claimed console view, but the Office Action also fails to show any teachings of any configuration parameters associated with the console view. The Office Action cites Thomas' FIG. 14, col. 20, l. 52-65, and col. 25, l. 34-38 as teaching these limitations. However, FIG. 14 is a block diagram of various handlers and makes no apparent reference to any

configuration parameters, col. 20, l. 52-65 discusses key codes for keyboard keys, and col. 25, l. 34-38 claims an internal sync generator that provides a sync signal. Thus, there is no apparent correspondence to the claim limitation of configuration parameters associated with a console view and display of data received at a console view consistent with those parameters.

Claim 8 depends from claim 7 and includes limitations similar to those of claim 2. Thus, claim 8 is not shown to be anticipated by Thomas.

Claim 3 depends from claim 1 and includes further limitations of selecting a subset of data from data received at an instance of a console view as a function of a second set of configuration parameters associated with the instance of the console view; and displaying the subset of data at the instance of the console view. In addition to the teachings of Thomas cited against claim 2, the Office Action cites Thomas' FIG. 15 and col. 25, l. 34-38. Thomas' FIG. 15 shows a schematic diagram of a serial mouse handler, and col. 25 further claims an on-screen display module that displays menus in accordance with a configuration. Even though Thomas teaches a configuration, there is no apparent correspondence to selecting a subset of data received in response to those parameters. Thus, the Office Action fails to show that claim 3 is anticipated.

Claim 9 depends from claim 7 and includes limitations similar to those of claim 3. Thus, claim 9 is not shown to be anticipated.

Claims 6 and 12 are apparatus claims and include limitations similar to those of claims 1 and 7, respectively. Thus, the Office Action does not establish that Thomas anticipates claims 6 and 12.

Claims 13 and 16 set forth computing arrangements for operating a data processing system with limitations similar to those explained above in regards to claim 1. In addition, claim 13 includes specific limitations of a data processing system hosting an operating system and a management interface processor coupled to the data processing system and hosting a plurality of logical console objects. Each logical console object is coupled to the operating system. None of the cited teachings contain an apparent logical console object, nor does the Office Action cite any specific element of Thomas as corresponding to a logical console object. The Office Action is similarly deficient in regards to the management interface processor that hosts the logical console object.

Claim 13 includes further limitations of an operations server computer system hosting a plurality of instances of a system operations program, each instance of the system operations program coupled to a respective logical console object. The cited teachings of Thomas have no apparent corresponding elements to these limitations. For example, Thomas at col. 8, l. 5-11 discusses a processor applying keyboard and mouse signals to appropriate ports. Thomas' at col. 25, l. 20-25 claims a computer interface interrupt service routine to precipitate transfer of keyboard, mouse, and video data to and from computer ports. Thus, the Office Action has not cited any teaching of an operations server that hosts a plurality of instances of a system operations program. The remaining limitations of claim 13 are similarly not shown to be taught by Thomas.

Claim 16 is not shown to be anticipated by Thomas for at least the reasons set forth above for claim 13.

Claims 14, 15, 17, and 18 include limitations similar to those discussed above. Therefore, the Office Action fails to show that Thomas anticipates these claims for at least the reasons set forth above.

The Office Action fails to establish that claims 1-4, 6-10 and 12-18 are anticipated under 35 U.S.C. 102(b) by "Bonnafoux" (US patent no. 5,592,676 to Bonnafoux et al.). The rejection is respectfully traversed because the Office Action does not show that all the limitations of the claims are taught by Bonnafoux.

The Office Action fails to show that Bonnafoux teaches the limitations of claims 1 and 7. Because the Office Action offers no explanation of specific elements of Bonnafoux thought to correspond to the claim limitations, certain presumptions may be made in an effort to understand the Examiner's basis for rejecting the claims. For example, in the limitations of initiating on one or more selected ones of the computer systems one or more instances of an independently operable console view, Bonnafoux's service processor 1 is presumed to allegedly correspond to the claimed data processing system to be controlled, and SPV 552 and SPU 652 of the cited FIG. 4 are presumed to be the elements that allegedly correspond to the claimed independently operable console views. With this presumed correspondence, it can be seen that the Office Action does not show that Bonnafoux teaches the further limitations of the claims.

The Office Action does not establish that Bonnafoux teaches the limitations of instantiating on the management interface processor one or more logical console objects. From FIG. 5 there is no apparent correspondence between illustrated elements and the claimed management interface processor and logical console objects. FIG. 5 shows a service processor 1 being controlled at station RSC 5. However, as indicated above the Office Action presumably alleges that Bonnafoux's service processor corresponds to the claimed data processing system that is being operated via the console views and logical console objects (the Office Action provides no guidance). Thus, the Office Action does not show that Bonnafoux teaches the limitations of and related to the management interface processor.

As to the limitations of initiating on one or more selected ones of the computer systems one or more instances of a system operations program, the Office Action cites Bonnafoux's claim to "each service processor being connected via a service console switch to a maintenance service console" (col. 11, l. 20-21) as suggesting these limitations. However, the instances of system operations programs are clearly different from the previously claimed logical console objects and console views. And the Office Action presumably alleges that Bonnafoux's service processor is the data processing system being operated remotely. Thus, Office Action has not cited any additional teachings that suggest the claimed system operations program and the limitations associated therewith.

The claims further include coupling the one or more instances of the system operations program to respective logical console objects. These limitations are not shown to be taught by Bonnafoux because the Office Action fails to identify any element of Bonnafoux as corresponding to the system operations program, and no elements of Bonnafoux appear to correspond.

The limitations of, in response to user-initiated connection requests, coupling each instance of the console view to a selected instance of the system operations program, are also not shown to be taught by Bonnafoux. The Office Action cites Bonnafoux's col. 2, l. 44-62 and col. 13, l. 35-55 as teaching these limitations. However, these sections contain no elements that in any apparent way correspond to the claim limitations. Further explanation of the alleged correspondences is respectfully requested if the rejection is maintained.

Since the Office Action fails to establish correspondences between specific elements of Bonnafoux and the claim limitations described above, it follows that the Office Action also fails to show the limitations of transmitting data received from a console view from instances of the system operations program to respectively coupled logical console objects and transmitting data received from the logical console objects to one or more instances of a console view.

The Office Action fails to show that Bonnafoux teaches the limitations of claims 2 and 8 of displaying data received at an instance of a console view in a manner consistent with a first set of configuration parameters associated with the instance of the console view. Bonnafoux's col. 4, l. 52-65 and col. 11, l. 26-29 are cited as teaching these limitations. However, there is no apparent correspondence to configuration parameters associated with a console view, nor any apparent correspondence to a console view. Thus, claims 2 and 8 are not shown to be anticipated. An explanation of the specific elements of Bonnafoux thought to correspond to the claim limitations is requested if the rejection is maintained.

The Office Action cites Bonnafoux's col. 4, l. 52-65 as teaching the limitations of claims 3 and 9 of selecting a subset of data from data received at an instance of a console view as a function of a second set of configuration parameters associated with the instance of the console view; and displaying the subset of data at the instance of the console view. This section of Bonnafoux does not describe any elements that in any apparent way correspond to selecting a subset of data, much less selecting the subset of data as a function of configuration parameters. Thus, claims 3 and 9 are not shown to be anticipated. An explanation of the specific elements of Bonnafoux thought to correspond to the claim limitations is requested if the rejection is maintained.

The Office Action fails to show that Bonnafoux teaches the limitations of claims 4 and 10. Having failed to show any elements of Bonnafoux that correspond to the claimed console view and system operations program, and Bonnafoux's cited teachings containing no apparent corresponding elements, it follows that no showing is made that Bonnafoux teaches the limitations of at least one of the one or more instances of the console view executing on a computer system other than the computer system on which the coupled instance of the system operations program executes.

Claims 6 and 12 are apparatus claims and include limitations similar to those of claims 1 and 7, respectively. Thus, the Office Action does not establish that Bonnafoux anticipates claims 6 and 12.

The cited teachings of Bonnafoux have no apparent corresponding elements to the limitations of claim 13. As with the method claims, the Office Action fails to show any correspondences between elements of Bonnafoux and specific claim limitations of an operations server computer system hosting a plurality of instances of a system operations program, each instance of the system operations program coupled to a respective logical console object. The cited teachings of Bonnafoux alleged to anticipate claim 13 are essentially the same as those used in rejecting the method claims. Thus, the Office Action has not cited any teaching of an operations server that hosts a plurality of instances of a system operations program. The remaining limitations of claim 13 are similarly not shown to be taught by Bonnafoux.

Claim 16 is not shown to be anticipated by Bonnafoux for at least the reasons set forth above for claim 13.

Claims 14, 15, 17, and 18 include limitations similar to those discussed above. Therefore, the Office Action fails to show that Bonnafoux anticipates these claims for at least the reasons set forth above.

The Office Action fails to establish that claims 4 and 10 are unpatentable under 35 U.S.C. 103(a) over Thomas in view of "Harple" (US patent no. 6,195,091 to Harple et al.). The rejection is respectfully traversed because the Office Action fails to show that all the limitations are suggested by the references, fails to provide a proper motivation for modifying the teachings of Thomas with teachings of Harple, and fails to show that the combination could be made with a reasonable likelihood of success.

As explained above, the Office Action fails to show that Thomas teaches the limitations of claims 1 and 7. Claims 4 and 10 depend from claims 1 and 7, respectively. Thus, the Office Action fails to show that the combination suggests all the limitations of claims 4 and 10.

Furthermore, the Office Action fails to establish that Harple suggests the limitations of at least one of the one or more instances of the console view executing on a computer system other than the computer system on which the coupled instance of the system operations program executes. Harple's col. 2, l. 33-36 is alleged to suggest these limitations. However, this section simply indicates that "the conference engine provides for tightly and loosely coupled sessions between the distributed application components, multiplexed message and data distribution, and distributed clipboarding." Thus, there is no apparent suggestion of the claimed console view and system operations program executing on different computer systems. The alleged teaching merely indicates a general use of distributed application components. This general allegation does not suggest the specific deployment of the claimed console view and the claimed system operations program on different computer systems.

The alleged motivation for modifying Thomas with Harple is improper. The alleged motivation states that "it would have been obvious ... to modify the methods/systems of Thomas with the teachings of Harple providing collaborative computing apparatus for multi-user, multi-computer connections (column 2 lines 33-36), to obtain the claimed invention plural console views (or any other computer executable code) executing in a distributed manner among different devices (col. 3 lines 39-52) ... to balance computer executable code load between central processing devices and/or relatively powerful end-user devices." This alleged motivation is unsupported by evidence, and is therefore improper.

The alleged motivation provides no evidence of deploying the claimed components as set forth in the claims. The motivation merely recites a general advantage of distributed computing and asserts that the claimed components may be distributed. Without such evidence, the alleged motivation is improper. Furthermore, without such evidence there is no apparent reasonable likelihood of successfully modifying Thomas with Harple.

The rejection of claims 4 and 10 over the Thomas-Harple combination should be withdrawn because the Office Action fails to show all the limitations are suggested by the combination, fails to provide a proper motivation for combining the references, and fails to show that the combination could be made with a reasonable likelihood of success.

The Office Action fails to establish that claims 5 and 11 are unpatentable under U.S.C. 103(a) over Bonnafoux in view of "Pedersen" (US patent no. 6,157,944 to Pedersen). The rejection is respectfully traversed because the Office Action fails to show that all the limitations are suggested by the references, fails to provide a proper motivation for modifying the teachings of Bonnafoux with teachings of Pedersen, and fails to show that the combination could be made with a reasonable likelihood of success.

As explained above, the Office Action fails to show that Bonnafoux teaches the limitations of claims 1 and 7. Claims 5 and 11 depend from claims 1 and 7, respectively. Thus, the Office Action fails to show that the combination suggests all the limitations of claims 5 and 11.

Furthermore, the Office Action fails to establish that Pedersen suggests the limitations of initiating on one or more selected ones of the computer systems an operations interface program; receiving at the operations interface program a connection request from an instance of the console view; creating a connection with the instance of the console view; and transferring the connection with the instance of the console view from the operations interface program to an instance of the system operations program. Pedersen's Abstract, col. 1, l. 46-50, col. 2, l. 24-26, and col. 3, l. 64-67 are alleged to suggest these limitations. However, these sections apparently teach creation of a number of protocol stacks for an application by a connection manager; notification to the connection manager of a connection, transferring to a protocol stack the connection between a port and a client node, and first establishing a connection to a "well-

known" port and later transferring the connection to a specific port. Thus, there is no apparent suggestion of the claimed initiation of an operations interface program receiving a connection request from a console view, creating the specific connection, and transferring the specific connection to the specific components. The cited general teachings of Pedersen's approach for connection management is not suggestive of the specific claim limitations stated above.

The alleged motivation for modifying Bonnafoux with Pedersen is improper. The alleged motivation states that "it would have been obvious ... to modify the methods/systems of Bonnafoux with the teachings of Pedersen, for easing maintenance in networked environments transferring a connection initiated in a node to another network node (abstract and column 3 lines 64-67) ... [for] collaboration and failure tolerance." This alleged motivation is unsupported by evidence, and is therefore improper.
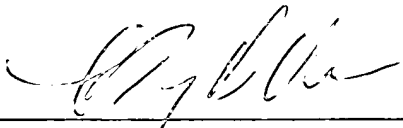
The alleged motivation provides no evidence to support any specific elements of Bonnafoux for which connections may be managed according to Pedersen's approach. The motivation merely recites a purported advantage of Pedersen and asserts that general teachings of Bonnafoux may be modified. Without evidence to support the alleged ease of maintenance, the alleged motivation is merely conclusory and improper. Furthermore, without such evidence there is no apparent reasonable likelihood of successfully modifying Bonnafoux with teachings of Pedersen.

The rejection of claims 5 and 11 over the Bonnafoux-Pedersen combination should be withdrawn because the Office Action fails to show all the limitations are suggested by the combination, fails to provide a proper motivation for combining the references, and fails to show that the combination could be made with a reasonable likelihood of success.

Withdrawal of the rejection and reconsideration of the claims are respectfully requested. No extension of time is believed to be necessary for consideration of this response. However, if an extension of time is required, please consider this a petition for a sufficient number of months for consideration of this response. If there are any additional fees in connection with this response, please charge Deposit Account No. 50-0996 (USYS.020PA).

Respectfully submitted,

CRAWFORD MAUNU PLLC
1270 Northland Drive, Suite 390
Saint Paul, MN 55120
(651) 686-6633

By: _____
Name: LeRoy D. Maunu
Reg. No.: 35,274